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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

JEREMY ROSENTHAL, AS LIQUIDATION
TRUSTEE OF THE WHC LIQUIDATION
TRUST.

Plaintiff.

V.

HALSEN HOLDINGS, LLC, a California limited liability company; SOUTH TEXAS ASSOCIATES & RESOURCES, a California corporation; PENINSULA HEALTHCARE MANAGEMENT LLC, a Nevada limited liability company; DANIEL BROTHMAN, an individual; EDITH BROTHMAN, an individual; STACY SEAN FOWLER, an individual; EDMUND C. KING, an individual; and DOES 1 through 100, inclusive.

Defendants.

Case No. 5:23-cv-06216-EKL

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE
STATEMENT DEADLINE &
[PROPOSED] ORDER**

THIRD REQUEST FOR EXTENSION

Courtroom: 7

Judge: Eumi K. Lee

Complaint Filed: December 1, 2023

Trial Date: None

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Jeremy Rosenthal (“Plaintiff”), in his
2 capacity as the Liquidation Trustee of the WHC Liquidation Trust and representative of the
3 bankruptcy estates of Watsonville Hospital Corporation (“WHC”) and certain of its affiliates
4 (collectively with WHC, the “Debtors”) and Defendants Halsen Holdings, LLC, South Texas
5 Associates & Resources, Peninsula Healthcare Management LLC, Daniel Brothman, Edith
6 Brothman, Stacy Sean Fowler, and Edmund C. King (“Defendants”) (collectively, the “Parties”)
7 hereby stipulate and agree as follows:

8 WHEREAS, on August 20, 2024, this Court reassigned this case to the Honorable Eumi K.
9 Lee, reset the deadline for the Parties to file their Joint Case Management Conference Statement
10 from August 22, 2024 to September 16, 2024, and vacated the Initial Case Management Conference
11 (“CMC”) set for September 5, 2024 (Dkt. 37);

12 WHEREAS, the Parties engaged in a mediation on August 28, 2024 and reached a
13 settlement in principle subject to documentation and obtaining approval of the proposed settlement
14 by either (a) the United States Bankruptcy Court for the Northern District of California in Case
15 No. 21-51477 (jointly administered) or (b) the Oversight Committee appointed pursuant to the plan
16 of liquidation confirmed in the Debtors’ chapter 11 bankruptcy cases;

17 WHEREAS, the Parties request an extension of the Joint Case Management Conference
18 Statement deadline until October 16, 2024 in order to finalize the settlement and to conserve the
19 time and resources of the Court and the Parties;

20 WHEREAS, on December 4, 2024, this Court entered an Initial Scheduling Order (Dkt. 5),
21 scheduling the Initial CMC for March 5, 2024;

22 WHEREAS, on January 18, 2024, the clerk reset the date of the CMC for March 14, 2024
23 following reassignment (Dkt. 14);

24 WHEREAS, on February 5, 2024, the Court granted, as modified, the Parties’ joint request
25 for extension of case management deadlines, setting the CMC to May 16, 2024 (Dkt. 16);

26 WHEREAS, on May 7, 2024, the clerk continued the CMC to June 13, 2024 (Dkt. 27);

27 WHEREAS, on June 11, 2024, the Court granted a stipulation to continue the Case
28 Management Conference to September 5, 2024 (Dkt. 33);

1 WHEREAS, there have been no other time modification requests in this case;

2 WHEREAS, the requested time modification would not have any effect on the schedule for

3 the case because the Court: (1) vacated all pretrial conference and trial dates before December 4,

4 2024 (Dkt. 37); and (2) ordered that all pretrial conference and trial dates after December 4,

5 2024 will remain in place (Dkt. 37) and no pretrial conference or trial dates have been set after

6 December 4, 2024;

7 WHEREAS, the Court has not stated that no further extensions will be granted;

8 WHEREAS, Plaintiff has filed a Declaration in support of this Stipulation as required under

9 Local Rule 6-2(a).

10 **IT IS SO STIPULATED.**

11 Dated: September 6, 2024

PERKINS COIE LLP

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By: /s/ Paul S. Jasper

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*Counsel to Plaintiff
Jeremy Rosenthal, as Liquidation
Trustee of the WHC Liquidation Trust*

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Healthcare Management, LLC, Daniel
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Fowler, and Edmund C. King*

Attestation Pursuant to Civil Local Rule 5-1(i)(3)

I, Paul S. Jasper, attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: September 6, 2024

/s/ Paul S. Jasper

Paul S. Jasper, Bar No. 200138

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2024

Hon. Eumi K. Lee
United States District Judge